

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GRAHAM CHASE ROBINSON,

Plaintiff,

-against-

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

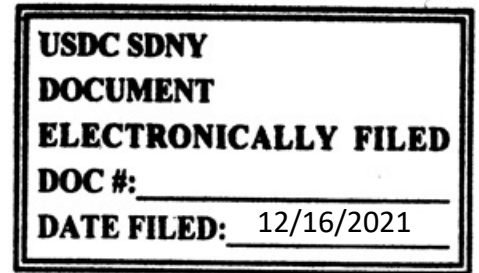
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**KATHARINE H. PARKER, United States Magistrate Judge:**

A case management conference was held on December 15, 2021, whereby the Court determined the following deadlines:

By December 17, 2021, Defendants shall submit the requests for admission, and responses thereto, that Defendants contend were not properly answered. The submission shall be accompanied by a letter motion to compel (no more than 4 pages). By December 24, 2021, Plaintiff shall submit a letter brief of no more than 4 pages setting forth her response.

The Court grants Defendants' request to move Plaintiff's deposition from December 17, 2021 to December 20, 2021. The parties shall meet and confer in good faith should Defendants require more than 7 hours for the deposition, consistent with the Court's instructions at the conference.

By December 17, 2021, Plaintiff is required to serve her 30(b)(6) deposition notice and provide Defendants with a list of other fact witnesses she seeks to depose and the approximate anticipated duration for each such witness' deposition. Defendants shall provide dates for these witnesses' depositions by Thursday, December 23, 2021.



**19-CV-9156 (LJL) (KHP)**

**ORDER**

To the extent the parties still have a dispute about the production of information from Plaintiff's AOL email account, Defendant's motion to compel shall be due December 31, 2021, Plaintiff's response will be due by January 7, 2022. No reply.

To the extent the parties still have a dispute about the production of information from Defendant De Niro's flip phone, Defendant's motion for a protective order shall be due by December 31, 2021 and Plaintiff's response will be due by January 7, 2022. No reply. To ascertain whether there are any relevant communications, Defendants shall obtain information about the phone numbers with which the flip phone communicated over the relevant period.

By December 24, 2021, Plaintiff shall provide an inventory of documents and other property and cash that was produced by truck delivery and shall inform Defendants whether, after her resignation, Plaintiff accessed the hard drive or cell phone that were in her possession and just returned to Defendants and the approximate date(s) she accessed them.

Lastly, to the extent the parties cannot resolve the outstanding disputes about documents that Defendants have withheld on privilege grounds, Plaintiffs shall file a motion to compel by January 7, 2022 which identifies the category of documents at issue. Defendants opposition due January 21, 2022. Defendants shall file a copy of the privilege log and a random sample of 20 documents from the category at issue for in camera review at the time their opposition is due. The privilege log accompanying the documents shall be a document-by-document log, in excel format, identifying the document number, author, recipients, job titles/attorney designations for each author/recipient, privilege(s) claimed, and general subject matter of the communication. The documents on the log shall be attached by hyperlink. The

log and documents shall be emailed to the Court's Chambers email for in camera review.

Defendants shall provide a copy of the document by document log (but not the underlying documents) to Plaintiff's counsel on January 21, 2022.

**SO ORDERED.**

DATED: New York, New York  
December 16, 2021



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KATHARINE H. PARKER  
United States Magistrate Judge